

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

GERALD F. LUCAS

Plaintiff

vs.

RIPAL M. PATEL

Defendant

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CIVIL ACTION

FILE NO. 5:16-CV-00009-CAR

DISCOVERY MEMORANDUM

TO: Judge C. Ashley Royal

FROM: All Counsel

DATE: August 10, 2016

1.

In accordance with the Court's Order of August 3, 2016 counsel for the parties in the above-captioned case have discussed discovery in this case.

2.

This case was originally pending in the State Court of Bibb County until it was dismissed under the five year rule. A renewal action was properly filed and the renewed case was removed to this Court. The parties have requested that the pleadings in the original action be admissible in this case. This request includes

the interrogatories and request to produce filed by the parties. With this request paper discovery in the case is complete and there are no known remaining issues related to interrogatories, request for production or request for admissions.

3.

The status of Depositions is as follows:

COMPLETED:

Gerald Lucas 1

Gerald Lucas 2

Ripal Patel

Jay Bender MD

James Chapuis MD

Amadi Hall PT

Ronald Dorsey

Veronica Dorsey

TO DO:

Shahram Rezaizmiri MD

(Dr. Rezaizmiri deposition

scheduled for August 11, 2016.

Deposition taken by Defendant for discovery)

Jason Billingshurst MD

(Have requested deposition dates

from his office. Deposition taken by

Defendant for possible use at trial).

4.

The status of expert discovery is as follows:

The only anticipated experts are Plaintiff's treating medical providers.

There are no discovery issues other than the scheduling of Dr. Billingshurst deposition who has moved his practice to Florida since his treatment of Plaintiff.

Respectfully submitted this 10th day of August, 2016.

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